

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LOGAN PAUL,

Plaintiff,

v.

STEPHEN FINDEISEN AND COFFEE
BREAK PRODUCTIONS, LLC d/b/a
COFFEEZILLA,

Defendants,

Civil Action No.: 5:24-cv-00717-OLG

DECLARATION OF STEPHEN FINDEISEN

I, Stephen Findeisen, state under penalty of perjury as follows:

1. My name is Stephen Findeisen. I am over the age of 18, of sound mind, and suffer from no legal or mental disabilities. I have never been convicted of a felony or of a crime or offense involving moral turpitude. I am fully competent to testify on the matters stated herein, which are within my personal knowledge and are true and correct.

2. I am a defendant in the above-captioned case. I am a member of the other defendant, Coffee Break Productions, LLC d/b/a Coffeezilla. I am submitting this declaration in support of Defendants' Response to Plaintiff's Motion to Compel.

3. I earned a Bachelor of Science degree in chemical engineering from Texas A&M University. After graduation, I began publishing short videos on YouTube debunking pop-science tropes and criticizing online finance "gurus" for scamming innocent people. My YouTube channel—Coffeezilla—eventually reached well over one million subscribers, and

publishing the results of my investigative journalism online is now my full-time occupation and primary source of income.

4. I have become well known for my investigations of cryptocurrency scams and fraudsters. In May 2022, the New Yorker published a profile of Coffeezilla, describing me as “one of the most prominent dissenting voices” against online snake oil salesmen. *See* Rachel Monroe, *Coffeezilla, the YouTuber Exposing Crypto Scams*, THE NEW YORKER (May 14, 2022), <https://www.newyorker.com/news/letter-from-the-southwest/coffeezilla-the-youtuber-exposing-crypto-scams>.

5. In January 2023, the *Washington Post* described me as a “powerful independent news source[], cataloguing and exposing some of the biggest instances of alleged fraud in the crypto industry,” including Sam Bankman-Fried’s FTX. *See* Taylor Lorenz, *Influencers Outshine Traditional Media on Coverage of FTX Implosion*, WASH. POST (Jan. 5, 2023), <https://www.washingtonpost.com/technology/2023/01/05/ftx-citizen-journalism/>. I personally interviewed Bankman-Fried on three occasions while FTX was in bankruptcy proceedings.

6. In 2022, I published a series of videos on Coffeezilla’s YouTube channel about my investigation of an online NFT-based cryptocurrency game called CryptoZoo, which was co-founded and heavily marketed to the public by Logan Paul. I investigated CryptoZoo by, among other things, speaking directly with sources with insider knowledge and reviewing documents and communications provided to me by those sources, including communications with Paul himself. My investigation revealed evidence that Paul and his partners used CryptoZoo to scam investors out of millions of dollars. My reporting was published on YouTube so it would be disseminated and available to the public at large.

7. Relative to my investigation of and reporting on Logan Paul and CryptoZoo, in late 2022 I obtained communications that Logan Paul was part of or copied on were provided to me by sources. Production of those communications, as provided to me, could be used to reveal my sources' identities. For example, I received screenshots of group text message conversations from my sources. Because of the way smartphones display text messages on the screen, a screenshot of a group text message conversation will inevitably reveal whose smartphone was used to take the screenshot. It would also be relatively easy for someone to analyze the communications and documents I received to narrow down who the source(s) was.

8. The correspondence between Logan Paul and others that I received from my sources were obtained during and in furtherance of my journalistic investigation of and reporting on Logan Paul and CryptoZoo. Disclosure of these communications would identify those sources directly or provide substantial context clues as to the source's identity.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge, recollection, and belief.

Executed on February 3, 2025.

Stephen Findeisen

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